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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GEO-GROUP COMMUNICATIONS, INC.,

Plaintiff,

Index No. 15-cv-01756
(KPF)

-v.-

RAVI CHOPRA; MAHENDRA SHAH; VIPIN
SHAH; 728 MELVILLE PETRO LLC; KEDIS
ENTERPRISES LLC; JMVD HILLSIDE LLC;
NYC TELECOMMUNICATIONS CORP.; and
SHALU SURI,

Defendants.

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NOTICE OF MOTION

PLEASE TAKE NOTICE that upon, and for the reasons stated in, Plaintiff Geo-Group Communications, Inc. (“GCI”)’s accompanying Declaration of Govind Vanjani Executed on December 6, 2022 (the “V. Dec.”), Memorandum of Law in Support of Plaintiff GCI’s Rule 60(b) Motion, and upon all exhibits and papers filed in this action, Geo-Group will move this Court on a date convenient for the Court, or as soon thereafter as counsel may be heard, for an order pursuant to Fed. R. Civ. P. 60(b)(3), 58(a), 58(c), 54(a), and 54(b), and the Court’s inherent power:

a. Setting aside the portion of the final judgment in this Action that is in favor of Defendants Ravi Chopra (“Chopra”) and NYC Telecommunications Corp. (“NYC Telecom”) to the extent that the judgment dismissed GCI’s claims against Chopra and NYC Telecom arising out of the \$1,350,000 Jaina transferred to Brog Lenirard Green & Genovese, P.C. (now known as Leech Tishman Brog) (“Brog”);

b. Setting aside the portion of the final judgment dismissing GCI’s claims against Chopra and NYC Telecom concerning the \$660,000 Jaina transferred in 2014 to JMVD Hillside LLC (“JMVD”) and 728 Melville Petro LLC (“Melville”) (the “LLC Transfers”);

c. Directing limited, additional discovery concerning the facts Chopra and NYC Telecom, and others, concealed from or misrepresented to GCI and the Court about the true nature of the Brog and LLC Transfers, including, without limitation, facts showing that Chopra, not Impex LTD (“Impex”) or Hillside or Melville, was the beneficiary of those transfers; and

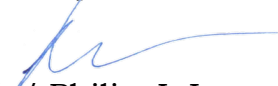
d. After limited discovery directing GCI, Chopra, and NYC Telecom to proceed to trial to adjudicate Chopra’s and NYC Telecom’s liability for the funds transferred to them or for their benefit; and

e. Granting such other and further relief as the Court may deem appropriate.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's November 28, 2022, Order (Dk. 366), answering papers must be served on or before January 6, 2023, and reply papers, if any, by January 13, 2023.

Dated: New York, New York
December 6, 2022

Respectfully submitted,


By: /s/ Philip J. Loree Jr.
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To: All Counsel of Record and Pro Se
Parties (via ECF)